

TRANSPARENCY INTERNATIONAL  
Defence security  
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[dc@transparency.org](mailto:dc@transparency.org)

5th February 2020

Dear TRANSPARENCY INTERNATIONAL representative,

Thank you for sharing with us the results of the Defence Companies Index on Anti-Corruption and Corporate Transparency (DCI) for our company. We find it a qualified indicator of opportunities of improvement of clear communication of our anti-corruption stance and safeguards. Please find below our response to the evaluation.

**In general, we must state that we do not agree with the final scoring for our company for the reasons stated below.**

**Justification:**

When setting up our compliance program, which also includes anti-corruption rules, we relied, among other things, on the rules of our parent company CZECHOSLOVAK GROUP a.s. (CSG). CSG is a holding company that brings together a number of manufacturing and trading companies specializing in both military and civilian production and based mainly in the Czech Republic and Slovakia. CSG creates a healthy corporate culture based on complete transparency and full compliance with all legislation and applicable standards.

We, together with CSG, follow the principle that "In our business, prudence is more important than profit". That is the reason we make every possible effort to prevent the corruption and bribery. The details about the CSG's (and thus ours as well) anti-bribery and anti-corruption policies and procedures are publicly available mainly on the on the parent company's website ([www.czechoslovakgroup.cz](http://www.czechoslovakgroup.cz), "About Us – Compliance program" section).

It states, among others that: "the CSG anti-corruption program was implemented in cooperation with the Czech branch of Transparency International to fulfil the requirements of the Defence Companies Index on Anti-Corruption and Corporate Transparency to the maximum extent possible".

The sole shareholder of CSG and the Chairman of the Board of Directors of CSG moreover publicly express his view and support for the anti-corruption program in the CSG Code of Ethics (<https://czechoslovakgroup.cz/code-of-ethics>) which forms the foundation for the entire CSG's compliance programme.

It has to be highlighted the fact that our anti-corruption and related rules follow the GSG's robust rules which was not considered in the evaluation neither review process. The evaluation also does not consider the national legislative differences and regional specifics for the publishing of information. Therefore, we believe that the final scoring of the evaluation doesn't reflect the reality correctly in case of our company.

Best regards

Jaroslav Skála  
executive head



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48